

24345 RF 94

DUE
DATE

ACTION

DIST	LTR	ENC
BURLINGAME A H		
BUSBY, W S		
CARNIVAL G J		
CORDOVA, R C		
DAVIS, J G		
FERRERA D W		
FRAY R E		
GEIS J A		
GLOVER, W S		
GOLAN, P M		
HANNI, B J		
HEALY T J		
HEDAHL, T G		
HILBIG, J G		
HUTCHINS, N M		
JACKSON, D T		
KELL, R E		
KUESTER, A W		
MARX, G E		
McDONALD, M M		
McKENNA, F G		
MORGAN, R V		
PIZZUTO, V M		
POTTER, G L		
SANDLIN, N B		
SATTERWHITE, D G		
SCHUBERT, A L		
SCHWARTZ, J K		
SETLOCK, G H		
STIGER, S G		
TOBIN, P M		
VOORHEIS, G M		
WILSON, J M		
PETERSON-WRIGHT L	X	
HOLLOWELL L	X	

Romer, Governor
la A Nolan, MD, MPH, Executive Director

cated to protecting and improving the health and environment of the people

ARDOUS MATERIALS AND WASTE MANAGEMENT DIVISION

Cherry Creek Dr S
er, Colorado 80222-1530
e (303) 692-3300
303) 759-5355

222 S 6th Street, Room 232
Grand Junction, Colorado 81501-2768
Phone (303) 248-7164
Fax (303) 248-7198

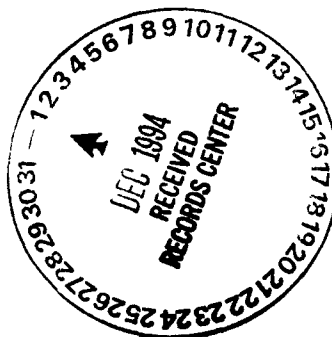
EC&G
ROCKY FLATS PLANT
CORRESPONDENCE CONTROL



Colorado Department
of Public Health
and Environment

November 14, 1994

Steve Slaten
IAG Project Coordinator-ER
Department of Energy
Rocky Flats Office
P O Box 928
Golden CO 80402-0928



000045200

RE. Operable Unit No. 7 Proposed Action Memorandum

Dear Mr Slaten

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the Division) and the Environmental Protection Agency (EPA) have reviewed the OU 7 Seep Collection and Treatment PAM

Our review has generated a few concerns which need clarification

- 1 The seep water should be double contained from the time it leaves the sump pump This would require the 2-inch piping which delivers the water up to the tanks to be double-walled rather than single-walled
- 2 The high-level alarm/pump shutoff should be positioned so that it will activate when there is 2 feet of freeboard remaining in the tanks
- 3 Has spill/drip containment at the tanks been planned?
- 4 Will the tanks be alternately emptied so that one can serve as contingency capacity? Will the two tanks be connected so that a full tank will overflow into the adjacent empty one?
- 5 Will it be necessary to drain the pond as stated in the assumption at the end of Section 3 1? Section 3 3 states that "minimal dewatering will be required"
- 6 Because the two tanks have a combined 4 5-day capacity, the 90-day storage limit for hazardous waste should not become a problem and the tanks will not need to be

CORRES CONTROL X X
ADMN RECORD/080
PATS/T130G

Reviewed for Addressee
Corres Control RFP

11-29-94
DATE BY

Ref Ltr #

DOE ORDER # 5400.1

ADMIN RECORD

A-OU07-0004.10

permitted However, DOE should be attentive to the 90-day limit and all other RCRA requirements for 90-day hazardous waste storage units

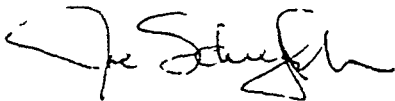
7 The 5 cubic yards of excavated material mentioned in Section 3.3 must be containerized, characterized, and disposed in a manner which follows the protocol for investigation-derived waste

8 To simplify the determination of performance standards, particularly in light of ongoing discussions of ARARs, adjust the language in Section 3.1 to require that the collected seep water to be treated at the OU2 Treatment Facility and assure that that facility maintains its effluent standards Table 3-1 and references to it can then be removed to avoid any confusion

Our review has otherwise determined that the referenced PAM is technically and regulatorily complete, and the proposed actions are therefore approved pending clarification of the items listed above and resolution of any comments from the public

If you have any questions regarding these matters, please contact Carl Spreng at 692-3358

Sincerely,



Joe Scheiffelin, Unit Leader
Rocky Flats IAG Unit
Hazardous Waste Control Program

cc Kurt Muenchow, DOE
Laurie Peterson-Wright, EG&G
Martin Hestmark, EPA
Arturo Duran, EPA
Laura Perault, AGO
Steve Tarlton, RFPU